

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. **CR10-150 RHK**

UNITED STATES OF AMERICA,	)	<b>INFORMATION</b>
	)	
Plaintiff,	)	(18 U.S.C. § 2)
	)	(18 U.S.C. § 1341)
v.	)	
	)	
SHARON MICHELLE THOMAS,	)	
	)	
Defendant.	)	
	)	

THE UNITED STATES ATTORNEY CHARGES THAT:

**COUNT 1**  
(Mail Fraud)

1. On or about January 2, 2006, in the State and District of Minnesota, the defendant,

SHARON MICHELLE THOMAS,  
along with others known and unknown, each aiding and abetting the other, devised and intended to devise a scheme and artifice to defraud and for the purpose of obtaining money or property by means of false or fraudulent pretenses, representations or promises, for the purpose of executing such scheme, deposited or caused to be deposited in the U.S. mail or with a private or interstate commercial carrier the closing package for D.F. for delivery from a licensed title company (Title Company A) to Accredited Home Lenders, Inc. as addressed thereon.

SCANNED

JUL 08 2010

U.S. DISTRICT COURT ST. PAUL

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**JUN 07 2010**  
FILED  
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2. In 2005 and 2006, the defendant was employed as a closing agent for Title Company A. Title Company A was affiliated with a local builder (Builder A) and closed residential real estate transactions for Builder A.

3. As a closing agent for Title Company A, the defendant was required to prepare documents for residential real estate transactions in a manner that truthfully memorialized the terms of those transactions.

4. The defendant provided such documents to the mortgage loan lenders funding the mortgage loans for each residential transaction.

5. Based on these documents, mortgage loan lenders provided loan proceeds to Title Company A such that the defendant could disburse the funds for the residential transaction(s) to which the funds related.

6. For transactions involving ten Builder A residences located in Minnesota and sold to "investors" associated with Superior Investment Group (SIG), the defendant knowingly and intentionally misrepresented the true terms of the transactions.

7. Specifically, the defendant concealed from mortgage loan lenders that she made undisclosed payments from mortgage loan proceeds to SIG and failed to truthfully memorialize those payments on closing documents provided to the lenders. The defendant mailed or caused the mailing of these misrepresentations to mortgage loan lenders in the form of closing packages for each of the ten

residences. These misrepresentations were material.

All in violation of Title 18, United States Code, Sections 1341 and 2.

Dated: 6/7/2010

B. TODD JONES  
United States Attorney



BY: Tracy L. Perzel  
Assistant U.S. Attorney  
Attorney ID No. 296326